

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA :
v. : No. 3:CR-16-312
MARK COOK a/k/a "Lucky," :
Defendant :

FOURTH SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:


Count 1

(Conspiracy to Commit Sex Trafficking by Force and Coercion)

From in or about April 2015 to in or about October 2016, in
Lackawanna, Luzerne, and Pike Counties, within the Middle District of
Pennsylvania, and elsewhere, the defendant,

MARK COOK a/k/a "Lucky,"

combined, conspired, and agreed with other persons whose identities
are known and unknown to the grand jury, to knowingly recruit, entice,
harbor, transport, provide, obtain, maintain by any means and benefit
financially and receive anything of value from participation in a venture

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engaged in such acts, in and affecting interstate or foreign commerce, at least eight female victims, knowing and in reckless disregard of the fact that force, threats of force, fraud, and coercion would be used to cause at least eight female victims to engage in a commercial sex act, in violation of 18 U.S.C. Section 1591(a) and (b)(1).

MANNER AND MEANS OF THE CONSPIRACY

1. The defendant and/or his co-conspirators used cell phones to take photographs of females and to post those photographs on a website named backpage.com to solicit customers to engage in commercial sex acts with those females.

2. The defendant and/or his co-conspirators used cell phones to arrange for customers to engage in sex acts with females.

3. The defendant and/or his co-conspirators rented motel and hotel rooms for females to use to engage in sex acts with customers.

4. The defendant and/or his co-conspirators transported females to motels and hotels to meet with customers to engage in sex acts for money.

5. The defendant and/or his co-conspirators used threats, force,

and intimidation to coerce females to engage in prostitution.

6. The defendant and/or his co-conspirators provided heroin, cocaine, and “molly” (MDMA) to females and used the females’ addiction to drugs to coerce them into working as prostitutes.

7. The defendant and/or his co-conspirators used pre-paid credit cards to pay for advertisements on backpage.com.

OVERT ACTS

In furtherance of the conspiracy and to effect the objects thereof, the defendant and/or his co-conspirators committed the following overt acts, among others:

1. In or about and between April 2015 and in or about October 2016, the defendant and/or his co-conspirators provided heroin, cocaine, and “molly” to females that worked for the defendant as prostitutes.

2. On or about December 6, 2015, the defendant rented a room at the Days Inn in Reading, Pennsylvania, and paid in cash.

3. On or about December 18-21, 2015, the defendant rented a room at the Days Inn in Reading, Pennsylvania, and paid in cash.

4. On or about April 16, 2016, the defendant rented a room at the Red Roof Inn in Wilkes-Barre, Pennsylvania, and paid in cash.

5. On or about May 13, 2016, the defendant rented a room at the Relax Inn in Wilkes-Barre, Pennsylvania, and paid in cash.

6. On or about May 16-18, 2016, the defendant rented a room at the Mohegan Sun Pocono Hotel, and paid in cash.

7. On or about May 27, 2016, the defendant rented a room at the Red Carpet Inn and Suites in Scranton, Pennsylvania, and paid in cash.

8. On or about May 29, 2016, a prostitute working for the defendant rented a room at the Red Carpet Inn and Suites in Scranton, Pennsylvania, and paid in cash.

9. On or about June 2, 2016, a prostitute working for the defendant rented a room at the Red Roof Inn in Wilkes-Barre, Pennsylvania, and paid in cash.

10. On or about June 3, 2016, a prostitute working for the defendant rented a room at the Red Roof Inn in Wilkes-Barre, Pennsylvania, and paid in cash.

11. On or about June 4, 2016, a prostitute working for the defendant rented a room at the Relax Inn in Wilkes-Barre, Pennsylvania, and paid in cash.

12. On or about June 5, 2016, a prostitute working for the defendant rented a room at the Red Roof Inn in Wilkes-Barre, Pennsylvania, and paid in cash.

13. On or about June 6-8, 2016, a prostitute working for the defendant rented a room at the Red Carpet Inn and Suites in Scranton, Pennsylvania, and paid in cash.

14. On or about June 9-11, 2016, a prostitute working for the defendant rented a room at the Red Carpet Inn and Suites in Scranton, Pennsylvania, and paid in cash.

15. On or about June 14, 2016, a prostitute working for the defendant rented a room at the Red Carpet Inn and Suites in Scranton, Pennsylvania, and paid in cash.

16. On or about June 14-20, 2016, a prostitute working for the defendant rented a room at the Econo Lodge in Scranton, Pennsylvania, and paid in cash.

17. On or about June 12-15, 2016, a prostitute working for the defendant rented a room at the Red Roof Inn in Wilkes-Barre, Pennsylvania, and paid in cash.

18. On or about June 24-28, 2016, a prostitute working for the defendant rented a room at the Relax Inn in Wilkes-Barre, Pennsylvania, and paid in cash.

19. On or about June 29, 2016, a prostitute working for the defendant rented a room at the Red Roof Inn in Wilkes-Barre, Pennsylvania, and paid in cash.

20. On or about July 1-3, 2016, a prostitute working for the defendant rented a room at the Econo Lodge in Scranton, Pennsylvania, and paid in cash.

21. On or about July 4, 2016, a prostitute working for the defendant rented a room at the Relax Inn in Wilkes-Barre, Pennsylvania, and paid in cash.

22. On or about July 5, 2016, a prostitute working for the defendant rented a room at the Econo Lodge in Scranton, Pennsylvania, and paid in cash.

23. On or about July 6, 2016, a co-conspirator rented a room at the Red Carpet Inn and Suites in Scranton, Pennsylvania, and paid in cash.

24. On or about July 10-13, 2016, a prostitute working for the defendant rented a room at the Relax Inn in Wilkes-Barre, Pennsylvania, and paid in cash.

25. On or about July 24, 2016, a prostitute working for the defendant rented a room at the Relax Inn in Wilkes-Barre, Pennsylvania, and paid in cash.

26. On or about July 25, 2016, a prostitute working for the defendant rented rooms at the Days Inn in Reading, Pennsylvania, and paid in cash.

27. On or about July 27, 2016, a prostitute working for the defendant rented a room at the Relax Inn in Wilkes-Barre, Pennsylvania, and paid in cash.

28. On or about July 28-31, 2016, a prostitute working for the defendant rented a room at the Relax Inn in Wilkes-Barre, Pennsylvania, and paid in cash.

29. On or about August 1-3, 2016, a prostitute working for the defendant rented a room at the Relax Inn in Wilkes-Barre, Pennsylvania, and paid in cash.

30. On or about August 2, 2016, a prostitute working for the defendant rented a room at the Red Roof Inn in Wilkes-Barre, Pennsylvania, and paid in cash.

31. On or about August 6, 2016, the defendant rented a room at the Red Carpet Inn and Suites in Scranton, Pennsylvania, and paid in cash.

32. On or about August 12, 2016, a prostitute working for the defendant rented a room at the Relax Inn in Wilkes-Barre, Pennsylvania, and paid in cash.

33. On or about August 13, 2016, a prostitute working for the defendant rented a room at the Red Carpet Inn and Suites in Scranton, Pennsylvania, and paid in cash.

34. On or about August 17, 2016, a prostitute working for the defendant rented a room at the Red Carpet Inn and Suites in Scranton, Pennsylvania, and paid in cash.

35. On or about August 19, 2016, a prostitute working for the defendant rented a room at the Red Carpet Inn and Suites in Scranton, Pennsylvania, and paid in cash.

36. On or about August 24-26, 2016, a prostitute working for the defendant rented a room at the Relax Inn in Wilkes-Barre, Pennsylvania, and paid in cash.

37. On or about August 26-September 5, 2016, a co-conspirator rented rooms at the Red Carpet Inn and Suites in Scranton, Pennsylvania, and paid in cash.

38. On or about August 30, 2016, a prostitute working for the defendant rented a room at the Relax Inn in Wilkes-Barre, Pennsylvania, and paid in cash.

39. On or about September 6, 2016, a prostitute working for the defendant rented a room at the Red Carpet Inn and Suites in Scranton, Pennsylvania, and paid in cash.

40. On or about August 30, 2016, the defendant had advertisements posted on backpage.com in the "Scranton escorts"

and “Scranton adult entertainment” sections of the website, showing women in provocative poses.

41. On or about September 3, 2016, the defendant physically assaulted a prostitute that was working for him.

42. On or about February 25, 2016, a co-conspirator rented a vehicle from Northern Car Rental in Scranton.

All in violation of Title 18, United States Code, Section 1594(c).

THE GRAND JURY FURTHER CHARGES:

Count 2

(Sex Trafficking by Force and Coercion)

From in or about March 2015 to in or about May 2015, in the Middle District of Pennsylvania, the defendant,

MARK COOK a/k/a “Lucky”

knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained by any means, and benefited financially and received anything of value from participation in a venture engaged in such acts, in and affecting interstate or foreign commerce, Victim #1, knowing and

in reckless disregard of the fact that force, threats of force, fraud, and coercion would be used to cause Victim #1 to engage in a commercial sex act.

All in violation of Title 18, United States Code, Section 1591(a) and (b)(1).

THE GRAND JURY FURTHER CHARGES:

Count 3

(Sex Trafficking by Force and Coercion)

From in or about December 2015 to in or about September 2016,
in the Middle District of Pennsylvania, the defendant,

MARK COOK a/k/a "Lucky"

knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained by any means, and benefited financially and received anything of value from participation in a venture engaged in such acts, in and affecting interstate or foreign commerce, Victim #2, knowing and in reckless disregard of the fact that force, threats of force, fraud, and coercion would be used to cause Victim #2 to engage in a commercial sex

act.

All in violation of Title 18, United States Code, Section 1591(a)
and (b)(1).

THE GRAND JURY FURTHER CHARGES:

Count 4

(Sex Trafficking by Force and Coercion)

From in or about June 2016 to in or about September 2016, in the
Middle District of Pennsylvania, the defendant,

MARK COOK a/k/a "Lucky"

knowingly recruited, enticed, harbored, transported, provided, obtained,
and maintained by any means, and benefited financially and received
anything of value from participation in a venture engaged in such acts,
in and affecting interstate or foreign commerce, Victim #3, knowing and
in reckless disregard of the fact that force, threats of force, fraud, and
coercion would be used to cause Victim #3 to engage in a commercial sex
act.

All in violation of Title 18, United States Code, Section 1591(a)

and (b)(1).

THE GRAND JURY FURTHER CHARGES:

Count 5

(Sex Trafficking by Force and Coercion)

From in or about August 2016 to in or about September 2016, in the Middle District of Pennsylvania, the defendant,

MARK COOK a/k/a "Lucky"

knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained by any means, and benefited financially and received anything of value from participation in a venture engaged in such acts, in and affecting interstate or foreign commerce, Victim #4, knowing and in reckless disregard of the fact that force, threats of force, fraud, and coercion would be used to cause Victim #4 to engage in a commercial sex act.

All in violation of Title 18, United States Code, Section 1591(a) and (b)(1).

THE GRAND JURY FURTHER CHARGES:

Count 6

(Sex Trafficking by Force and Coercion)

From in or about December 2015 to in or about January 2016, in the Middle District of Pennsylvania, and elsewhere, the defendant,

MARK COOK a/k/a "Lucky"

knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained by any means, and benefited financially and received anything of value from participation in a venture engaged in such acts, in and affecting interstate or foreign commerce, Victim #5, knowing and in reckless disregard of the fact that force, threats of force, fraud, and coercion would be used to cause Victim #5 to engage in a commercial sex act.

All in violation of Title 18, United States Code, Section 1591(a) and (b)(1).

THE GRAND JURY FURTHER CHARGES:

Count 7

(Sex Trafficking by Force and Coercion)

From in or about January 2015 to in or about October 2016, in the Middle District of Pennsylvania, and elsewhere, the defendant,

MARK COOK a/k/a "Lucky"

knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained by any means, and benefited financially and received anything of value from participation in a venture engaged in such acts, in and affecting interstate or foreign commerce, Victim #6, knowing and in reckless disregard of the fact that force, threats of force, fraud, and coercion would be used to cause Victim #6 to engage in a commercial sex act.

All in violation of Title 18, United States Code, Section 1591(a) and (b)(1).

THE GRAND JURY FURTHER CHARGES:

Count 8

(Sex Trafficking by Force and Coercion)

From in or about January 2016 to in or about October 2016, in the Middle District of Pennsylvania, and elsewhere, the defendant,

MARK COOK a/k/a "Lucky"

knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained by any means, and benefited financially and received anything of value from participation in a venture engaged in such acts, in and affecting interstate or foreign commerce, Victim #7, knowing and in reckless disregard of the fact that force, threats of force, fraud, and coercion would be used to cause Victim #7 to engage in a commercial sex act.

All in violation of Title 18, United States Code, Section 1591(a) and (b)(1).

THE GRAND JURY FURTHER CHARGES:

Count 9

(Sex Trafficking by Force and Coercion)

From in or about January 2016 to in or about October 2016, in the Middle District of Pennsylvania, and elsewhere, the defendant,

MARK COOK a/k/a "Lucky"

knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained by any means, and benefited financially and received anything of value from participation in a venture engaged in such acts, in and affecting interstate or foreign commerce, Victim #8, knowing and in reckless disregard of the fact that force, threats of force, fraud, and coercion would be used to cause Victim #8 to engage in a commercial sex act.

All in violation of Title 18, United States Code, Section 1591(a) and (b)(1).

THE GRAND JURY FURTHER CHARGES:

Count 10

(Attempted Sex Trafficking by Force and Coercion)

From in or about January 2015 to in or about February 2015, in the Middle District of Pennsylvania, the defendant,

MARK COOK a/k/a "Lucky"

knowingly attempted to recruit, entice, harbor, transport, provide, obtain, and maintain by any means, and benefit financially and receive anything of value from participation in a venture engaged in such acts, in and affecting interstate or foreign commerce, Victim #9, knowing and in reckless disregard of the fact that force, threats of force, fraud, and coercion would be used to cause Victim #9 to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1594(a) and 1591(a) and (b)(1).

THE GRAND JURY FURTHER CHARGES:

Count 11

**(Transporting an Individual in Interstate Commerce
to Engage in Prostitution)**

From on or about February 25, 2016 to on or about March 2, 2016,
in the Middle District of Pennsylvania, and elsewhere, the defendant,

MARK COOK a/k/a "Lucky,"

did knowingly transport an individual in interstate commerce from the
State of Pennsylvania to the State of Connecticut, to engage in
prostitution and any sexual activity for which any person can be
charged with a criminal offense.

In violation of Title 18, United States Code, Sections 2421 and 2.

THE GRAND JURY FURTHER CHARGES:

Count 12

**(Persuading an Individual to Travel in Interstate Commerce
to Engage in Prostitution)**

On or about March 7, 2016, in the Middle District of
Pennsylvania, and elsewhere, the defendant,

MARK COOK a/k/a "Lucky,"

did knowingly persuade, induce, entice and coerce any individual to
travel in interstate commerce, from the state of Pennsylvania to the
state of New York, to engage in prostitution and any sexual activity for
which any person can be charged with a criminal offense, and
attempted to do so.

In violation of Title 18, United States Code, Sections 2422(a)

THE GRAND JURY FURTHER CHARGES:

Count 13

(Conspiracy to Distribute and Possession with Intent to Distribute
Controlled Substances)

From in or about June 2013 to in or about October 2016, in
Lackawanna and Luzerne Counties, Pennsylvania, within the Middle
District of Pennsylvania, and elsewhere, the Defendant,

MARK COOK a/k/a "Lucky,"

did combine, conspire, and agree with other persons known and unknown
to the grand jury, to commit an offense against the United States, namely
to knowingly, intentionally and unlawfully distribute and possess with intent
to distribute heroin and "molly" (MDMA), Schedule I controlled
substances, and cocaine, a Schedule II controlled substance, in violation
of Title 21, United States Code, Sections 841(a)(1).

All in violation of Title 21, United States Code, Section 846.

THE GRAND JURY FURTHER CHARGES:

Count 14

Possession with Intent to Distribute Heroin and Cocaine

From in or about February 2015 to in or about April 2015, in Pike and Lackawanna Counties, Pennsylvania, within the Middle District of Pennsylvania, and elsewhere, the Defendant,

MARK COOK a/k/a "Lucky,"

did knowingly, intentionally and unlawfully possess with intent to distribute cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

THE GRAND JURY FURTHER CHARGES:

Count 15

(Attempted Witness Tampering)

On or about and between September 3, 2016 and November 15, 2016, within the Middle District of Pennsylvania, the Defendant,

MARK COOK a/k/a "Lucky,"

did knowingly attempt to intimidate, threaten and corruptly persuade another person by asking the person to recant his/her statement to law enforcement about facts and evidence related to a criminal investigation and prosecution, with the intent to influence the testimony of the person in an official proceeding, an investigation by the Federal Bureau of Investigation and a federal grand jury into drug trafficking and sex trafficking offenses.

In violation of Title 18, United States Code, Section 1512(b)(1).

THE GRAND JURY FURTHER CHARGES:

Introduction

At all times material to this superseding indictment:

1. The defendant, Mark Cook, resided in Scranton, Pennsylvania.
2. Patricia Cook, the mother of Mark Cook, resided in Scranton, Pennsylvania, and was the owner of a 2004 Lexus ES 330 vehicle (PA Registration JJF7395).
3. The Hartford Financial Services Group was headquartered in the state of Connecticut.

The Scheme and Artifice to Defraud

On or about August 31, 2016, in the Middle district of Pennsylvania, the defendant, Mark Cook, did knowingly and willfully devise and intend to devise, and participate in, a scheme to defraud the Hartford Financial Services Group, and to obtain money from the Hartford Insurance Company by means of false and fraudulent pretenses, representations, and promises.

It was part of the scheme and artifice to defraud and obtain money

from the victim that:

- (a) Mark Cook on or about August 31, 2016, staged a vehicle accident in Scranton, Pennsylvania, by instructing and having another person deliberately drive a U-Haul truck into a 2004 Lexus ES 330, a vehicle owned by Patricia Cook, thereby causing damage to the insured Lexus vehicle.
- (b) Patricia Cook on or about September 7, 2016, notified the Hartford Financial Services Group about the “accident” for purposes of filing an insurance claim.
- (c) Mark Cook on or about September 13, 2016, made false and fraudulent representations about the “accident” to a Hartford Financial Services Group insurance adjuster.

Count 16

(Wire Fraud)

The Grand Jury re-alleges and incorporates the Introduction and Scheme and Artifice to Defraud portions of this second superseding indictment as though set forth herein:

On or about September 14, 2016, in Lackawanna County,

within the Middle District of Pennsylvania, and elsewhere, the
Defendant,

MARK COOK a/k/a "Lucky,"

for the purpose of executing said scheme and artifice to defraud, did
knowingly cause to be transmitted by means of interstate wire
communications, certain sounds, signals, and writings, either sent
from or received within the Middle district of Pennsylvania, namely
an electronic funds transfer of \$5391 to a bank account in the name
of Patricia Cook.

In violation of Title 18, United States Code, Section 1343, and
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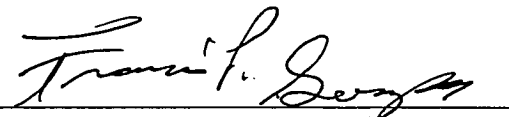
A TRUE BILL

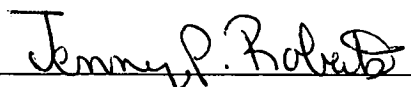
Date:

05/14/2019



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